STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Globalcom, Inc.	)	
	)	
vs.	)	
	)	
Illinois Bell Telephone Company, d/b/a Ameritech Illinois	)	Docket No. 02-0365
	)	
In the Matter of a Complaint Pursuant to 220 ILCS 5/13-515, 220 ILCS 10/101 and 10-108.	)	

VERIFIED STATEMENT OF ROGER WURSTER

Q. Please state your name.

A. Roger Wurster.

Q. Who is your employer and what is your position?

A. I am Vice President of Network Operations/Engineering for Globalcom, Inc.

Q. What are your responsibilities?

A. I report to the Chief Technology Officer, Eric Wince. I am responsible for all network engineering, operations and planning development for the LEC, IXC, ISP and broadband aspects of the company. I am responsible for the installation and maintenance of all network equipment and facilities. I am responsible for the operation of Globalcom's switch facilities and interconnection with LECs and IXCs.

Q. Please describe your employment history with Globalcom, including positions held, responsibilities and dates.

A. I started with Globalcom in April of 2000 as Director of Network Operations. I became Vice President of Network Operations in September of 2000. My responsibilities are to manage, direct and train Globalcom's Network personnel and manage the Department, including budgeting and forecasts. I also oversee the build, implementation, organization, expansion, and maintenance of the DMS 500, OC12/48 SONET ring and Digital Termination equipment that supports Globalcom's Local and Long Distance communication network. I provide RFI/RFP responses for Switching product portfolio. I also provide assistance to Globalcom customers for design of their new internal telephony and internet networks or implementation of new products and services that Globalcom provides with emphasis on the DMS 500 product line. I am also responsible for the coordination of NPA/NXX code utilization and assignments.

Q Please describe your employment history prior to your employment with Globalcom.

A. I have over twenty-two years of experience in the telecommunications industry. I began my career with the United States Air Force with installation, maintenance and management of Class IV and Class V electronic switching equipment for intercontinental communication deployment from April 1980 to December 1992. I left the Air Force with the rank of Technical Sergeant. After my military service, I joined WilTel and left in April 1995 as a Senior Nationwide Long Distance Technician and headed the Carrier Group providing Level 2 support. I was then a Systems Engineer with Advantis from April 1995 to July 1996. I then joined Sprint PCS as Site Supervisor and was responsible for the build of two MTX Cellular Switch sites along with 150 Cell site deployments. I then joined

Cox Communication in July 1997 to July 1999 as a Switch Manager and was responsible for the build and operation of local and long distance networks through Class V switch facilities with a 3 SONET redundant ring architecture, 70 Access Nodes for residential dial tone and 20 collocation sites in the US West service territory. July 1999 I was promoted to Network Engineering Manager.

Q. **Please describe Globalcom's network**.

A. Globalcom is a facilities based carrier in LATA 358. We have switch facilities located at 717 S. Wells, Chicago Illinois. This facility secures our Nortel DMS 500 Local/Long Distance switch, Cisco 7576 & 7206 Routers, Alcatel 1630 SX, Tellabs 532 LS and the Tellabs 5500 Digital Access Cross Connect System (DACS). This equipment along with Ameritech OC48 Fujitsu FLM 2400 owned and operated equipment is housed within the same premises that support our Network architecture.

Q. How does Globalcom interconnect with Ameritech?

A. We are interconnected to Ameritech's network through an OC48 ring that connects the Franklin and Wabash tandems. The OC-48 SONET ring is an entryway into those two Ameritech tandems, which gives us access to the surrounding Ameritech Tandem offices using DS3s (each DS3 is comprised of 28 T1s) for our Local traffic inside LATA 358. We have DS3 Hub facilities that connect to Ameritech Tandem Offices. From those Tandems, we extend to additional Tandem Offices further out in LATA 358 to support of our Local network. This arrangement gives us a presence throughout LATA 358 without having to deploy expensive collocation facilities to provide dial tone to our

customers. Instead, we are able to provide dial tone in LATA 358 through our DMS 100.

Q. Is there any reason why Globalcom should be required to be collocated with Ameritech?

A. No. There is no need for Globalcom to deploy collocation facilities in LATA 358. As I said, Globalcom is able to provide local dial tone to our customers through the DMS 100. We are interconnected through an OC48 to Tandem offices throughout LATA 358. We transport dial tone from the DMS 100, through the Tandem offices and eventually to the customer with dedicated local services, such as a PRI or Local/Long Distance T1. When Globalcom deployed its network, the decision was made to design a network in LATA 358 that would not require collocation. Competitive carriers, like Globalcom, should be able to use new technologies and methods to provide services to clients and they should not be tied down to doing business just like the incumbent regional carriers. Establishing collocation with the incumbent is costly, burdensome and time intensive. Now, if Globalcom wanted to provide dial tone for POTS, CENTREX and other non-dedicated services through its own facilities, then we would have had to consider the option of collocation. Nonetheless, that option was not required as we expanded Globalcom's customer base in LATA 358.

Q. What would establishing a collocation arrangement with Ameritech entail?

A. A collocation arrangement would most likely require an initial $500,000 of sunk cost investment in equipment, ongoing lease obligations, power requirements and

additional labor expenses. Given competing demands for capital requirements it does not make economic sense for Globalcom to do that right now.

Q. How has Globalcom's network been designed so that it is not dependent on a collocation arrangement with Ameritech?

A. Nortel designed the DMS 500 to meet the needs of companies, like Globalcom, that provide both local and long distance services. The DMS 500 is really two switches in one. Although it is physically one switch, it has two very distinct sides – the DMS 100 Local side and the DMS 250 Long Distance side. The DMS 100 side of the switch provides local dial tone to our dedicated local customers. Their circuits originate and terminate from that side of the switch. On the other hand, our dedicated and switched long distance customers are served from the DMS 250 side of the switch.

Q. How is a local call routed for a Globalcom customer with either a local PRI or local/long distance T1?

A. A local call that originates at the customer location is routed through their customer premises equipment and handed off to the special access facilities that we lease from Ameritech. At the serving central office, Ameritech transports the call through cross connects to bundled transport that terminates at a Tandem where Globalcom leases a M1/3 Multiplexer (MUX). A DS3 Globalcom leases from Ameritech as Special Access which is connected to the MUX, then transports the call to the near end office Tandem serving Globalcom. Globalcom has also leased a DS3 at that near end office Tandem which transports the call to the OC48 SONET ring, and after going through Ameritech's ADM (Add Drop

Multiplexer), the call terminates at the Globalcom switch port on the DMS 100 side of the switch. At that point, the switch software determines whether the call is local or long distance. If it is local, then the DMS 100 processes the call. If the call is intra or interstate, then it is handed off to the DMS 250 for processing.

Q Can you explain how commingling will not be an issue in the event that the Commission determines that termination fees do not apply to the conversion of special access circuits to EELs.

A. While I am not a lawyer and have only a general familiarity with the FCC's Local Use Test and the prohibition against connecting EELs with tariffed special access circuits, I understand that the FCC's rules require Globalcom to reconfigure its DS3s so that special access circuits are not combined on the same DS3 as PRI's and local T1s. Globalcom will not undertake the expense of reconfiguring its circuits so that all of the circuits on a large number of its DS3s will contain circuits used exclusively for local circuits that comply with the FCC Local Use Test unless it is necessary. There is no engineering or technical reason to do so at this time given Ameritech's current demands regarding termination penalties and collocation. Because the network is designed the way I described above, the reconfiguration of circuits to avoid commingling is just a matter of separating the local dedicated products that will be converted to EELs from the dedicated long distance services that will not be converted. It will be administratively time intensive, but it will not be difficult from an engineering standpoint.

Q. Why hasn't Globalcom been able to complete its business strategy?

A. Ameritech has stated that it will apply termination penalties for all OPP special access circuits that Globalcom converts to EELs. I cannot currently reconfigure the network since most of the circuits, according to Ameritech, would be subject to termination penalties, especially the existing DS3s that are the backbone of the network. Absent Ameritech's collocation requirement for new EELs, I could lease DS3s as EELs and begin to pare off the month-to-month special access circuits that Ameritech would not assess termination fees for conversion. Thus, Ameritech's policies have frustrated Globalcom's attempt to access EELs.

Q. Is it reasonable for Ameritech to demand that Globalcom configure its network as Ameritech sees fit?

A. No.

Q. Why are Ameritech's demands unreasonable?

A. Ameritech forces Globalcom into a Hobson's choice. I cannot order the DS3s or DS1s to terminate at the DMS 100 unless I order them as Special Access circuits, which of course defeats the whole purpose of reconfiguring the network. As I said above, there is no reason for Globalcom to invest in collocation facilities other than to satisfy Ameritech's demand. Why should I lock Globalcom into special access service tariffs when it is not technologically required and collocation adds undue expense and administrative burdens?

Q. Do you agree with Ameritech's assertion that a termination of service occurs during a conversion of special access to EELs?

A. No. Globalcom believes very strongly that there will be no service disruption in converting our Special Access circuits to EELs. There will be no change to local loops or to our network in this conversion. This is a simple circuit identification change to appease the billing forum. We have converted many circuits that have been changed without any service disruption or change in circuit design.

Q. Does that conclude your direct testimony?

A. Yes.